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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ZACHARY MADELL,

Plaintiff,

v.

TELENAV, INC., DOUGLAS MILLER,
H.P. JIN, SAMUEL CHEN, WES
CUMMINS, and RANDY L. ORTIZ,

Defendants.

Case No: 1:21-cv-00106-RPK-SJB

**NOTICE OF VOLUNTARY DISMISSAL
PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(i)**

PLEASE TAKE NOTICE that, pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Zachary Madell hereby voluntarily dismisses the above-captioned action without prejudice. Defendants have not served an answer or a motion for summary judgment.

Dated: February 17, 2021

Respectfully submitted,

HALPER SADEH LLP

By: /s/ Daniel Sadeh
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CERTIFICATE OF SERVICE

I, Daniel Sadeh, hereby certify that on February 17, 2021, a true and correct copy of the annexed **NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i)** was served in accordance with the Federal Rules of Civil Procedure with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all parties with an email address of record who have appeared and consented to electronic service in this action.

Dated: February 17, 2021

/s/ Daniel Sadeh
Daniel Sadeh